

THE LAW OFFICE OF GREGORY JAVARDIAN, LLC

By: Mary F. Kennedy, Esquire

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Patricia Townes

Debtor(s)

Chapter 13 Proceeding

24-10682 PMM

**CERTIFICATION OF NO RESPONSE**

Citizens Bank, N.A. (“Movant”) by and through its counsel, Mary F. Kennedy, Esquire, hereby avers and certifies as follows:

1. On May 22, 2024, Movant filed with this Court a Motion for Relief from the Automatic Stay pursuant to Section 362 of the United States Bankruptcy Code.
2. A response date for the Motion was scheduled for June 5, 2024.
3. On May 22, 2024, Mary F. Kennedy, Esquire, Attorney for Movant sent a true and correct copy of the Motion for Relief and Notice of hearing to consider Motion to Debtor, Debtor’s Attorney, Michael A. Cibik, Esquire and the Chapter 13 Trustee, Kenneth E. West, Esquire.
4. There has been no Response by the Debtor or the Chapter 13 Trustee.
5. Movant is entitled to relief from the automatic stay pursuant to 11 U.S.C. Section 362.

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WHEREFORE, Movant respectfully requests this Honorable Court ORDER:  
That Relief from the Automatic Stay be granted to Citizens Bank, N.A. to proceed with foreclosure action to obtain all other Relief available under Non-Bankruptcy Law. That the relief granted by the Court will survive the conversion of this bankruptcy case to a case under any other Chapter of the Bankruptcy Code. And that bankruptcy Rule 4001(a)(3) is not applicable, and Movant is allowed to immediately proceed with foreclosure and all other relief available under the non-Bankruptcy law. That Federal Rule of Bankruptcy Procedure 3002.1 is no longer applicable. Movant respectfully requests that reasonable attorney fees and costs associated with this Motion be awarded to Movant.

Respectfully Submitted,

/s/ Mary F. Kennedy

DATE: July 10, 2024